

SEP 23 1999

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FAX TRANSMITTAL

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DATE: 9-22-99
TO: Lester Snow
FAX NUMBER: _____
RE: _____
FROM: San Diego Baykeeper
TOTAL PAGES INCLUDING FAX COVER SHEET: 3
COMMENTS: _____

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San Diego BayKeeper, 1450 Harbor Island Drive, Suite 205, San Diego, CA 92101
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Member of the national WaterKeeper Alliance

September 21, 1999

Lester Snow
Executive Director
CalFed Bay/Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814



Dear Mr. Snow:

On behalf of San Diego BayKeeper, a 501(c)(3) non-profit corporation dedicated to protecting and restoring San Diego Bay and surrounding watersheds, I wish to enter the following comments into the formal record for your Draft Programmatic Environmental Impact Report and Statement for the CALFED Bay/Delta Program. I join other members of the environmental community in asking that the Program be revised to:

- commit to building no new dams, reservoirs, or canals or expanding existing dams, reservoirs, or canals during CALFED's "Stage 1" (the first seven years of the program);
- increase the CALFED Program's focus on pollution prevention and other environmentally superior alternatives;
- increase investments in water conservation and efficiency, groundwater management, pollution prevention, and drinking water treatment;

BayKeeper applauds CALFED's approach of developing a "Programmatic EIR" that provides the community with a basic understanding of what the long-term goals of the Program are. While supportive of this approach, its limitations are also apparent. A flexible and phased approach is necessarily not specific enough to allow adequate comments on program specifics. Additionally, even though CEQA and NEPA specifically require that projects not be bifurcated during the EIR/EIS process, the risk that CALFED will initiate activities in phase I that will be binding in the future is real.

Specifically, BayKeeper is concerned with the approach of pursuing a "test peripheral canal". To quote the San Joaquin DeltaKeeper's comments, "the rush to build projects before we have an adequate understanding of the biological complexity of this estuary or the fate, transport and effects of contaminants is a recipe for failure." More extensive study is needed for the first leg of the peripheral canal as even this segment could cause great harm to the environment and would not bring appreciable improvements in drinking water quality. Investing hundreds of millions of dollars in this first leg could also inevitably bind CALFED to pursue a full peripheral canal, which was not adequately addressed in the EIR/EIS. In order to be fiscally as well as environmentally prudent, we must understand the full environmental impacts of a completed peripheral canal before a "test canal" is implemented.

Additionally, the resources allocated to pollution prevention, watershed management and other environmentally superior alternatives are insufficient when compared with the "build" alternatives. For example, \$913 million is allocated to conveyance activities

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1098
while watershed management only receives \$250 million. Yet, an aggressive watershed protection program can accomplish what even the best technologies cannot – preventing water pollution before it starts.

In its phased approach, CALFED should first invest in environmentally friendly alternatives – conservation, pollution prevention, watershed management, restoration and the like. Only to the extent that these methods do not achieve stated goals should CALFED then explore the possibility of pursuing dams, reservoirs, or canals during phase II of the Program. It is imprudent and inappropriate to have taxpayers subsidize new or expanded dams, reservoirs, or canals until superior alternatives are exhausted.

Thank you for your time and consideration. If you have any questions or need additional information, please contact me at 619-299-4484.

Sincerely,



Bruce Reznik
Executive Director

cc: Governor Gray Davis